

**International Color Manufacturers Association
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Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

November 5, 2006

Dear Administrator:

On behalf of the International Color manufacturers Association (IACM), I wish to thank the Environmental Protection Agency (EPA) for their comments on the test plan and robust summaries on Sulfanilic acid (CAS No. 121-57-3) and o-Toluene sulfonic acid, 4-amino-5-methoxy- (p-Cresidine sulfonic acid) (CAS No. 6471-78-3)

The IACM serves is an industry consortium to coordinate testing activities for chemical substances under the Chemical Right-to-Know Program. Since 2000, the companies that are current members of IACM have supported the collection and review of available test data, development of test plans and robust summaries, and conducted additional testing.

Based on our initial recommendations and the peer-reviewed comments of the EPA, IACM is pleased to submit the following revised test plan and robust summaries for this substance. The revised test plan and robust summaries contain additional data on existing studies and the results of additional toxicity studies that are related to the questions and comments made by the EPA in its letter dated 10/05/2005. This letter contains responses to the specific comments made by the EPA. These responses taken together with the inclusion of new study data and other information constitute the key changes to the original test plan and robust summaries.

Based on these additional data, the IACM concludes that the current test plan and robust summaries for this food color is now complete. The experimental and model data for physiochemical properties, environmental

fate, ecotoxicity, and human health endpoints are consistent and provide a comprehensive basis upon which to evaluate the hazard potential of these two substances.

Based on the additions and revisions to the test plan and robust summaries, we conclude that the test plan and robust summaries are final and have no plans to provide additional data. The EPA comprehensive comments provided the necessary guidance to complete the test plan for this category. The collaboration between the IACM and the Environmental Protection Agency in the Chemical "Right to Know" Program has produced a hazard database that will be useful to the public for decades to come. Thank you for the opportunity to participate in such a program.

If you have any questions or comments concerning the contents of this letter, please feel free to contact me at any time (202-331-2325) or tadams@therobertsgroup.net.

Best regards,

Timothy B. Adams, Ph.D.

Technical Contact Person for IACM